

# SMITH | VILLAZOR

Smith Villazor LLP  
250 West 55th Street, 30th Floor  
New York, NY 10019  
www.smithvillazor.com

**RODNEY VILLAZOR**

T 212 582 4400

D 212 377 0852

rodney.villazor@smithvillazor.com

April 14, 2022

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court for the  
District of New Jersey  
Martin Luther King Courthouse  
50 Walnut Street Room 2C  
Newark, NJ 07101

**Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)  
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his bail conditions as follows:

1. Permission to attend his children's sports games only on weekends with a third-party custodian. Each game, including time and location, must be pre-approved by Pretrial.
2. Permission to attend church services on Sundays with a third-party custodian.
3. Permission to accompany a third-party custodian to pick up his children after school on weekdays.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche remain at his residence under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved proposed bail modifications to these conditions (dks 187, 193, 225, and 229).

Pretrial Services has no objection to our proposed requests. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.  
SMITH VILLAZOR LLP

Hon. Michael A. Hammer

April 14, 2022

Page Two

cc: Andrew Lourie, Esq.  
Benjamin Sauter, Esq.  
Amanda Tuminelli, Esq.  
Government counsel of record (via ECF and e-mail)  
U.S. Pretrial Services Officer David Hernandez (via e-mail)  
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)